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FILED
Clerk
District Court

JUN 12 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KENNETH COUTURE,

Plaintiff,

v.

AMERICAN OVERSEAS MARINE
CORPORATION and GENERAL
DYNAMICS CORPORATION,

Defendants.

CIVIL ACTION NO. CV05-0024

**STIPULATION EXTENDING CASE
MANAGEMENT ORDER
DEADLINES**

WHEREAS, the parties have retained multiple experts in this case and, despite due diligence, require additional time to obtain expert reports; and

WHEREAS, the plaintiff has encountered difficulty in producing plaintiff's expert reports and, despite due diligence, requires additional discovery time for this task;

WHEREAS, even with the exercise of due diligence, the parties are unable to meet the existing Case Management deadlines for expert witness reports and expert witness discovery;

The parties hereby STIPULATE to extend forthcoming deadlines listed in the Case Management Scheduling Order, filed on September 20, 2005, approximately 90 days to allow for the orderly accomplishment of the foregoing. The parties propose the following Case Management Order deadlines:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Plaintiff's Expert Disclosures	April 3, 2006	June 16, 2006
Defendant/Third Party Defendant Expert Disclosures	April 24, 2006	August 18, 2006
Completion of Expert Discovery	June 1, 2006	September 29, 2006
Hearing on Dispositive Motions	July 13, 2006	November 10, 2006
Settlement Conference	July 21, 2006 @ 9:00 a.m.	July 21, 2006 @ 9:00 a.m.
Jointly-prepared Final Pretrial Order pursuant to Local Rule 16.2CJ.e.9	August 11, 2006	November 6, 2006
Final Pretrial Conference	August 18, 2006 @ 9:00 a.m.	November 17, 2006 @ 9:00 a.m.
Trial	August 28, 2006 @ 9:00 a.m.	November 27, 2006 @ 9:00 a.m.

SO STIPULATED AND AGREED TO.

CARLSMITH BALL LLP
Attorneys for Defendants American
Overseas Marine Corporation and
General Dynamics Corporation


By: DAVID P. LEDGER, ESQ.

Date: June 8, 2006

LAW OFFICE OF WILLIAM M. FITZGERALD
Attorney for Plaintiff


By: WILLIAM M. FITZGERALD, ESQ.

Date: June 12, 2006